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Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
MICHELLE YANG IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBITS TO DECLARATION OF  
MATTHEW BERRY IN SUPPORT OF  
DEFENDANTS' UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S OPPOSITION  
TO WAYMO'S MOTION TO  
SUPPLEMENT TRIAL WITNESS LIST**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this  
3 declaration based upon matters within my own personal knowledge and if called as a witness, I  
4 could and would competently testify to the matters set forth herein. I make this declaration in  
5 support of Defendants' Administrative Motion to File Under Seal Exhibits to Declaration of  
6 Matthew R. Berry in Support of Defendants' Uber Technologies, Inc. and Ottomotto LLC's  
7 Opposition to Waymo's Motion to Supplement its Trial Witness List ("Opposition").

8 2. I have reviewed the following documents and confirmed that only the portions  
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition	Highlighted Portions	Plaintiff (Green) Defendants (Blue)
Exhibit 5	Entire Document	Plaintiff
Exhibit 6	Highlighted Portions	Plaintiff (Green)

16 3. The blue-highlighted portions of the Opposition contain highly confidential  
17 information relating to financial reserves of Uber. This information has been maintained as  
18 confidential. Disclosure of this information will allow Uber's competitors to understand its  
19 financial resources and business strategy, such that competitors can obtain an unfair advantage in  
20 tailoring their own business strategy and Uber's competitive position would be significantly  
21 harmed.

22 4. The green-highlighted portions of the Opposition and Exhibit 6 and the entirety of  
23 Exhibit 5 contain information that has been designated "Highly Confidential – Attorneys' Eyes  
24 Only" or "Confidential" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model  
25 Protective Order ("Protective Order"), which the parties have agreed governs this case (Transcript  
26 of 3/16/2017 Hearing, page 6). The highlighted portions of the Opposition and Exhibit 6, and the  
27 entirety of Exhibit 5 have been designated as "Highly Confidential – Attorneys' Eyes Only."  
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1 Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective  
2 Order.

3 5. Defendants' request to seal is narrowly tailored to the portions of the exhibits and  
4 that merit sealing.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd  
6 day of December, 2017 at San Francisco, California.

7  
8 /s/ Michelle Yang

MICHELLE YANG  
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**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Michelle Yang has concurred in this filing.

Dated: December 3, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ